

## EXHIBIT K

**To:** "Steel, Howard S." <HSteel@brownrudnick.com>

**Subject:** Re: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

**From:** "Martorana, Keith R." <KMartorana@gibsondunn.com>

**Date:** 2017-08-14 19:25:48 -0400

We are waiting for final approval from client, but unlikely to come tonight. You are, however, authorized to send current versions to New GM this evening

On Aug 14, 2017, at 6:44 PM, Steel, Howard S. <HSteel@brownrudnick.com> wrote:

How's the trust looking on sign off?

**From:** Golden, Daniel [<mailto:dgolden@AkinGump.com>]

**Sent:** Monday, August 14, 2017 4:10 PM

**To:** Steel, Howard S.; Martorana, Keith R.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; [bobh@hmgclawfirm.com](mailto:bobh@hmgclawfirm.com); [steve@hilliardshadowenlaw.com](mailto:steve@hilliardshadowenlaw.com); [tjh@tjhlaw.com](mailto:tjh@tjhlaw.com); [mehenry@thomasjhenrylaw.com](mailto:mehenry@thomasjhenrylaw.com); [lnorman@andrewsmyers.com](mailto:lnorman@andrewsmyers.com); [kelly@hmgclawfirm.com](mailto:kelly@hmgclawfirm.com)

**Cc:** Weisfelner, Edward S.; [Steve@hbsslaw.com](mailto:Steve@hbsslaw.com); [ChrisO@hbsslaw.com](mailto:ChrisO@hbsslaw.com); [ecabraser@lchb.com](mailto:ecabraser@lchb.com); Geman, Rachel (External); [esserman@sbeplaw.com](mailto:esserman@sbeplaw.com); Forster, Jill L.

**Subject:** RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

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I think that is right; participating holders are signed off subject to guc trust being signed off

#### Daniel H. Golden

A K I N G U M P S L T L R P A U S S H A U E R & F E L

One Bryant Park | New York, NY 10036-6745 | USA | Direct: [+1 212.872.8010](tel:+12128728010) | Internal: [38010](tel:38010)

Fax: [+1 212.872.1002](tel:+12128721002) | [dgolden@akingump.com](mailto:dgolden@akingump.com) | [akingump.com](http://akingump.com) | [Bio](#)

**From:** Steel, Howard S. [<mailto:HSteel@brownrudnick.com>]

**Sent:** Monday, August 14, 2017 4:06 PM

**To:** Golden, Daniel; Martorana, Keith R.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; [bobh@hmgclawfirm.com](mailto:bobh@hmgclawfirm.com); [steve@hilliardshadowenlaw.com](mailto:steve@hilliardshadowenlaw.com); [tjh@tjhlaw.com](mailto:tjh@tjhlaw.com); [mehenry@thomasjhenrylaw.com](mailto:mehenry@thomasjhenrylaw.com); [lnorman@andrewsmyers.com](mailto:lnorman@andrewsmyers.com); [kelly@hmgclawfirm.com](mailto:kelly@hmgclawfirm.com)

**Cc:** Weisfelner, Ed (External); [Steve@hbsslaw.com](mailto:Steve@hbsslaw.com); [ChrisO@hbsslaw.com](mailto:ChrisO@hbsslaw.com); [ecabraser@lchb.com](mailto:ecabraser@lchb.com); Geman, Rachel (External); [esserman@sbeplaw.com](mailto:esserman@sbeplaw.com); Forster, Jill L.

**Subject:** RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

We can send to him when everyone signed off - please advise if you have not already

To confirm will send to him: all of docs circulated to this group this morning. will not be sending him proffered evidence and expert reports

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**From:** Golden, Daniel [<mailto:dgolden@AkinGump.com>]  
**Sent:** Monday, August 14, 2017 3:48 PM  
**To:** Martorana, Keith R.; Steel, Howard S.; Weintraub, William P; Fox, Gregory W.; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; [bobh@hmgllawfirm.com](mailto:bobh@hmgllawfirm.com); [steve@hilliardshadowenlaw.com](mailto:steve@hilliardshadowenlaw.com); [tjh@tjhlaw.com](mailto:tjh@tjhlaw.com); [mehenry@thomasjhenrylaw.com](mailto:mehenry@thomasjhenrylaw.com); [lnorman@andrewsmyers.com](mailto:lnorman@andrewsmyers.com); [kelly@hmgllawfirm.com](mailto:kelly@hmgllawfirm.com)  
**Cc:** Weisfelner, Edward S.; [Steve@hbssl.com](mailto:Steve@hbssl.com); [ChrisO@hbssl.com](mailto:ChrisO@hbssl.com); [ecabraser@lchb.com](mailto:ecabraser@lchb.com); Geman, Rachel (External); [esserman@sbeplaw.com](mailto:esserman@sbeplaw.com); Forster, Jill L.  
**Subject:** RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

**External E-mail. Use caution accessing links or attachments.**

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Can someone please advise me who will be in a position to send the final documentation to Arthur by cob today. We need to do this so he doesn't use this as an excuse at the Thursday chambers conference.

**Daniel H. Golden**

**A K I N G U M P S L T L R P A U S S H A U E R & F**  
One Bryant Park | New York, NY 10036-6745 | USA | Direct: [+1 212.872.8010](tel:+12128728010) | Internal: [38010](tel:+12128728010)  
Fax: [+1 212.872.1002](tel:+12128721002) | [dgolden@akingump.com](mailto:dgolden@akingump.com) | [akingump.com](http://akingump.com) | [Bio](#)

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**From:** Martorana, Keith R. [<mailto:KMartorana@gibsondunn.com>]  
**Sent:** Monday, August 14, 2017 3:46 PM  
**To:** Steel, Howard S.; Weintraub, William P; Fox, Gregory W.; Golden, Daniel; Newman, Deborah; Moss, Naomi; Williams, Matt J.; Gillett, Gabriel K.; Chorba, Christopher; [bobh@hmgllawfirm.com](mailto:bobh@hmgllawfirm.com); [steve@hilliardshadowenlaw.com](mailto:steve@hilliardshadowenlaw.com); [tjh@tjhlaw.com](mailto:tjh@tjhlaw.com); [mehenry@thomasjhenrylaw.com](mailto:mehenry@thomasjhenrylaw.com); [lnorman@andrewsmyers.com](mailto:lnorman@andrewsmyers.com); [kelly@hmgllawfirm.com](mailto:kelly@hmgllawfirm.com)  
**Cc:** Weisfelner, Ed (External); [Steve@hbssl.com](mailto:Steve@hbssl.com); [ChrisO@hbssl.com](mailto:ChrisO@hbssl.com); [ecabraser@lchb.com](mailto:ecabraser@lchb.com); Geman, Rachel (External); [esserman@sbeplaw.com](mailto:esserman@sbeplaw.com); Forster, Jill L.  
**Subject:** RE: Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

On the DTC Notice, the percentage of Unitholders represented by Akin should be 65%. If you are controlling the final versions of the documents, can you please make that change?

At this point we do not have any further comments, but are obtaining final sign-off from our client.

**Keith Martorana**  
Of Counsel

**GIBSON DUNN**

Gibson, Dunn & Crutcher LLP  
200 Park Avenue, New York, NY 10166-0193  
Tel +1 212.351.3991 • Fax +1 212.351.6391  
[KMartorana@gibsondunn.com](mailto:KMartorana@gibsondunn.com) • [www.gibsondunn.com](http://www.gibsondunn.com)

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**From:** Steel, Howard S. [<mailto:HSteel@brownrudnick.com>]  
**Sent:** Monday, August 14, 2017 1:32 PM  
**To:** Weintraub, William P <[WWeintraub@goodwinlaw.com](mailto:WWeintraub@goodwinlaw.com)>; Fox, Gregory W. <[GFox@goodwinlaw.com](mailto:GFox@goodwinlaw.com)>; [dgolden@akingump.com](mailto:dgolden@akingump.com); [dnewman@akingump.com](mailto:dnewman@akingump.com); [nmoss@akingump.com](mailto:nmoss@akingump.com); Williams, Matt J. <[MJWilliams@gibsondunn.com](mailto:MJWilliams@gibsondunn.com)>; Gillett, Gabriel K. <[GGillett@gibsondunn.com](mailto:GGillett@gibsondunn.com)>; Chorba, Christopher <[CChorba@gibsondunn.com](mailto:CChorba@gibsondunn.com)>;

Pg 4 of 5  
[bobb@hmgllawfirm.com](mailto:bobb@hmgllawfirm.com); [steve@hilliardlaw.com](mailto:steve@hilliardlaw.com); [tjh@tjhlaw.com](mailto:tjh@tjhlaw.com);  
[mehenry@thomasihenrylaw.com](mailto:mehenry@thomasihenrylaw.com); [Lnorman@andrewsmyers.com](mailto:Lnorman@andrewsmyers.com); [kelly@hmgllawfirm.com](mailto:kelly@hmgllawfirm.com);  
Martorana, Keith R. <[KMartorana@gibsondunn.com](mailto:KMartorana@gibsondunn.com)>  
**Cc:** Weisfelner, Edward S. <[EWeisfelner@brownrudnick.com](mailto:EWeisfelner@brownrudnick.com)>; [Steve@hbsslaw.com](mailto:Steve@hbsslaw.com);  
[ChrisO@hbsslaw.com](mailto:ChrisO@hbsslaw.com); [ecabraser@lchb.com](mailto:ecabraser@lchb.com); [rgeman@lchb.com](mailto:rgeman@lchb.com); [esserman@sbep-law.com](mailto:esserman@sbep-law.com);  
Forster, Jill L. <[jForster@brownrudnick.com](mailto:jForster@brownrudnick.com)>  
**Subject:** Motors - GUC Trust Settlement Agreement - SUBJECT TO FRE 408

**SUBJECT TO FRE 408**

Please see attached proposed final execution versions of all of the documents. Redlines are to versions circulated Friday.

Please let us know any comments or questions and confirm when you are signed off. Thanks.

Howard S. Steel  
Brown Rudnick LLP  
Seven Times Square  
New York, New York 10036  
212.209.4917 (direct)  
732.757.1898 (cell)  
212.938.2806 (direct fax)  
[hsteel@brownrudnick.com](mailto:hsteel@brownrudnick.com)

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